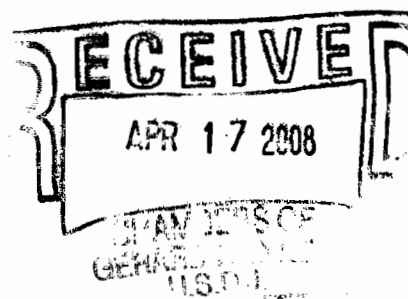


RECEIVED



MICHAEL A. CARDOZO
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

Sumit Sud
Assistant Corporation Counsel
ssud@law.nyc.gov
(212) 788-1096
(212) 788-9776 (fax)

April 16, 2008

BY HAND DELIVERY

The Honorable Gerard E. Lynch
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Daniel v. City of New York et al.
08 Civ. 2918(GEL)

Your Honor,

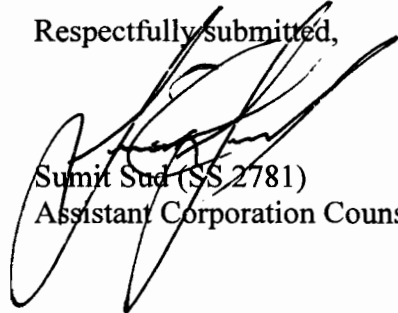
I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department and the attorney assigned to the above-referenced matter. I write to respectfully request that defendant City of New York be granted an enlargement of time from the present date until June 13, 2008, to answer or otherwise respond to plaintiff's complaint. Plaintiff's counsel Robert Blossner, Esq., has not yet responded to defendant's telephone message requesting his consent to this request. However, under the circumstances, defendant has no reason to believe plaintiff would object hereto. This is defendant City's first request for an enlargement of time to answer.

There are several reasons for seeking an enlargement of time. In accordance with this office's obligation under Rule 11 of the Federal Rules of Civil Procedure, we need time to investigate the allegations of the complaint. Plaintiff alleges that, on or about April 12, 2007, he was falsely arrested on by defendants for possession of stolen property and wrongfully detained until his arraignment. Plaintiff also appears to allege that he was maliciously prosecuted insofar as the underlying criminal charges brought against him were dismissed by the District Attorney's Office. To that end, this office is in the process of forwarding to plaintiff for execution a N.Y.C.P.L. §160.50 release so that we can access the sealed records from his underlying criminal prosecution. Furthermore, to the extent that plaintiff alleges any physical or emotional injuries, this office is also in the process of forwarding a HIPPA compliant medical release to plaintiff so that we can access plaintiff's medical records.

*

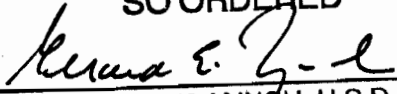
Accordingly, defendant City of New York respectfully requests that its time to respond to the complaint be extended until June 13, 2008. Thank you for your consideration of this request.

Respectfully submitted,



Sumit Sud (SS 2781)
Assistant Corporation Counsel

cc: Robert Blossner, Esq.
30 Vesey Street
New York, New York 10007 (By Regular Mail)

**SO ORDERED*

GERARD E. LYNCH, U.S.D.J.